

REMARKS

This application has been reviewed in light of the above-mentioned Office Action. Claims 1-26 are presented for examination, of which Claims 1 and 12 are in independent form. Claims 1 and 6 are amended herein. Claim 1 is amended to more clearly define certain claimed features of the present invention; Claim 6 is amended simply to improve its form and clarity, and not for any reason relating to the claim rejections discussed below. Favorable reconsideration and entry of this amendment is respectfully requested.

The Office Action states that Claims 1-26 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0049853 (Chu). Without conceding the propriety of this rejection, Applicants have amended independent Claim 1 to distinguish the present invention over Chu, and submit that Claims 1 and 12, and the claims dependent thereon, are patentably distinct from Chu for at least the following reasons.

As amended, Claim 1 recites, *inter alia*, a file transformation component configured to reformat, validate, and enrich file content. Because the Office Action at page 3 considers these features as options from which only one must be present, Applicants have specifically amended Claim 1 to clarify that all three features are **not** optional, but rather they are required. Thus, the file transformation component of the present invention has at least three features: the ability to reformat file content, the ability to validate file content, and the ability to enrich file content. Individual support for each feature may be found at paragraphs [0023]-[0025] of the specification.

The Chu application fails to teach or suggest a file transformation component configured with all three claimed features. According to the Office Action, Chu discloses the validation of file content at page 8, paragraphs [0106]-[0107]. Even if such a reading is correct, this citation is only sufficient to establish that Chu apparently teaches the validation of data. However, nothing in these paragraphs suggests either the reformatting or the enriching of file content, both of which are necessary features of the present invention. The remaining relevant citations to Chu contained in the Office Action point to page 3, paragraph [0054], and page 8, paragraph [0108]. In these paragraphs, Chu merely describes the compressing, archiving, and encrypting of data.

While the Examiner is justified in giving Applicants' claims their broadest reasonable interpretation, this interpretation must be consistent with one that those skilled in the art would reach. *In re Cortright*, 165 F.3d 1535, 1359. Those skilled in the art would appreciate that what is disclosed by Chu—the compressing, archiving, and encrypting of data—does nothing to change the format of a file's content, and furthermore does not enrich the content of a file. Thus, Chu fails to read on either the reformatting or enriching of file content, and therefore the reference fails to teach or suggest a file transformation component as recited by Claim 1. Accordingly, Applicants submit that Claim 1 is not anticipated by Chu, and respectfully request withdrawal of the rejection.

The Chu application also fails to teach or suggest the method recited by Claim 12. Among the necessary features recited by Claim 12 are the reformatting and validating of file content. As discussed above with respect to Claim 1, while Chu may

read on the validation of file content, the cited art fails to disclose the reformatting of file content. Therefore, Claim 12 is also believed to be patentable.

The remaining rejected claims in this application depend from either Claim 1 or Claim 12, and are thus submitted to be patentable for at least the same reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

Applicants submit that entry of this Amendment is deemed to be proper. The claims, if amended as proposed, are believed to overcome the rejections set forth in the Office Action, and therefore the amendments place the application in condition for allowance or in better condition for appeal. The amendments were not presented earlier as it was believed that the previously-presented claims would be found allowable. No new matter has been added by this Amendment, nor does it present new issues requiring further consideration or research. Moreover, the Examiner's familiarity with the subject matter of the present application will allow an appreciation of the significance of the amendments without undue expenditure of time and effort.

Accordingly, in light of the foregoing amendments and remarks, Applicants request entry of this amendment as well as favorable reconsideration, withdrawal of the foregoing rejections and an early Notice of Allowance.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Lawrence A Stahl/

Lawrence A. Stahl
Attorney for Applicants
Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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